



U.S. Department of Justice

Antitrust Division

New York Office

26 Federal Plaza
Room 3630
New York, New York 10278-0004

212/335-8000
FAX 212/335-8023

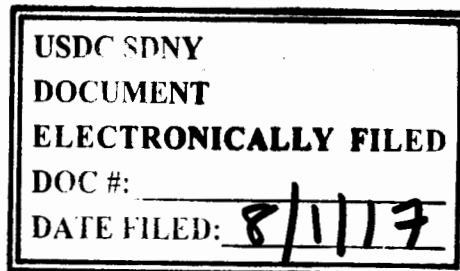
MEMO ENDORSED

P.2

July 31, 2017

ECF & HAND DELIVERY

Honorable Richard Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312



Re: U.S. v. Richard Usher et al, 17-Crim-019 (RMB)

Dear Judge Berman,

On behalf of the United States, Defendant Richard Usher, and Defendant Christopher Ashton, we jointly seek a minor revision to the pretrial release conditions for these two defendants.

Paragraph 5 of the current pretrial release orders for Mr. Usher and Mr. Ashton, as entered by this Court on July 17, 2017, require the defendants to return their passports to the U.S. Embassy in London, England, each time they return to the United Kingdom after appearing before Your Honor in this matter. After inquiring with authorities in the United Kingdom, the government has found that the Embassy will not in fact retain those passports and instead will require a different procedure that may cause delays for the defendants when attempting to retrieve their passports for approved travel. Therefore, for the sake of allowing efficient travel by the defendants and ensuring timely attendance before the Court, both the government and counsel for Defendants Usher and Ashton seek the Court's approval to allow these defendants to return to and maintain their passports with their London counsel instead. (Note that the pretrial release order for co-defendant Rohan Ramchandani already allows him to return and maintain his passport with his counsel, and therefore does not need the same revision.)

By signing this letter below, London-based counsel for Mr. Usher and Mr. Ashton each represent to this Court that they will return the passport to their client only as necessary for him to conduct travel that is approved under that client's pretrial release order, and will keep the passport securely in their possession at all other times.

Application Granted, on consent.	Sincerely yours,
	<i>Carrie A. Syme</i>
	Carrie A. Syme Trial Attorney
	Jeffrey D. Martino Chief, New York Office
	SO ORDERED: Date: <u>8/1/17</u> <i>Richard M. Berman</i> Richard M. Berman, U.S.D.J. U.S. Department of Justice, Antitrust Div. Federal Plaza, Room 3630 New York, NY 10278

Michael Kendall
Andrew Tomback
Yakov Malkiel
White & Case LLP
Attorneys for Richard Usher

1221 Avenue of the Americas
New York, NY 10020-1095

Jonathan Pickworth
White & Case LLP
Attorneys for Richard Usher

5 Old Broad Street
London, England EC2N 1DW

David Schertler
Lisa Manning
Schertler & Onorato LLP
Attorneys for Christopher Ashton

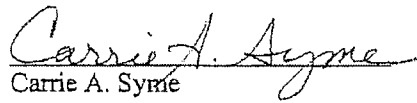
1101 Pennsylvania Ave., N.W.
Suite 1150
Washington, D.C. 20004

Sara George
Stephenson Harwood LLP
Attorneys for Christopher Ashton

1 Finsbury Circus
London, England EC2M 7SH

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Sincerely yours,


Carrie A. Syme
Trial Attorney

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Chief, New York Office

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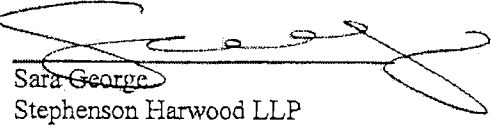
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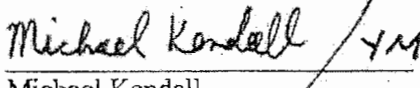
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Sincerely yours,


Carrie A. Syme
Trial Attorney

Jeffrey D. Martino
Chief, New York Office

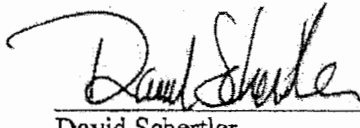
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